

In the matter of IBOC and Digital broadcast audio, I wish to present myself as one of a number of persons who listen to and enjoy night time skip distant reception on AM frequencies. I submit that this is a larger number of people than is generally recognized in the industry. Comments I have previously seen concerning the adjacent channel noise problem experienced when IBOC is used on AM indicate that distant night AM reception will be substantially impaired by this system. Simply put, I feel this is a contravening of the rights of this class of listener without due process, and without any corresponding technical gain which could not be replicated with alternative technical means.

I used to, but no longer work in the broadcast industry (when it was all analog) and presently work with data communications. Basically the concept is that if you have a channel with high data rate (digital audio) then you transport it on a medium that supports high data rates natively (VHF or UHF).

The Commission today has a chance to see that digital audio, a worthwhile concept, is implemented on a medium that natively supports it, and not implemented on a technically flawed hack medium such as IBOC on the AM band which already has substantial technical questions being raised. Thank you.